

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DIRECTORS OF THE MOTION PICTURE
INDUSTRY PENSION PLAN AND
DIRECTORS OF THE MOTION PICTURE
INDUSTRY HEALTH PLAN,

Plaintiffs,

vs.

FILMS IN MOTION, LLC, NTF
PRODUCTIONS, LLC, CARJACKED
ENTERTAINMENT, LLC, and BLOODOUT
PRODUCTIONS, LLC,

Defendants.

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT**

Case No. 17-cv-10037 (RA)

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Gillian Costello in Support of Motion for Default Judgment and exhibits annexed thereto, Declaration of Chris Tashchyan in Support of Motion for Default Judgment and exhibits annexed thereto, and Plaintiffs' Memorandum of Law in Support of Motion for Default Judgment, and all other papers and proceedings had herein, Plaintiffs Directors of the Motion Picture Industry Pension Plan and Directors of the Motion Picture Industry Health Plan ("Directors" or "Plaintiffs") by and through their undersigned attorneys, will move this Court before the Honorable Ronnie Abrams at the United States District Court, Southern District of New York, 40 Foley Square, Courtroom 1506, New York, New York 10007, at a date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 55(b)(2) and Local Civil Rule 55.2(b) to enter default judgment in favor of Plaintiffs and against Defendants Films in Motion, LLC, NTF Productions, LLC, and Carjacked Entertainment, LLC, granting all other relief sought in the

Complaint, and granting any and all other relief as the Court deems just and proper, on the grounds that said Defendants failed to answer or otherwise defend against the Complaint.

Date: New York, New York
July 6, 2018

Respectfully submitted,

SPIVAK LIPTON LLP
Attorneys for Plaintiffs

By: /s/
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TO:

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Baton Rouge, LA 70809

NTF Productions, LLC
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Los Angeles, CA 90036

Carjacked Entertainment, LLC
11625 Highland Dr.
Baton Rouge, LA 70810

Bloodout Productions, LLC
10000 Celtic Drive
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